

Exhibit 21

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No. 17-md-2804

Judge Dan Aaron

This document relates to: Polster

The County of Cuyahoga v. Purdue  
Pharma L.P., et al.

Case No. 18-OP-45090

City of Cleveland, Ohio v. Purdue  
Pharma L.P., et al

Case No. 18-OP-45132

The County of Summit, Ohio, et al.  
v. Purdue Pharma L.P., et al.

Case No. 17-OP-45004

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Deposition of
JOHN PRINCE

January 30, 2019
9:04 a.m.

Taken at:
Ulmer & Berne
1660 W. 2nd Street, Suite 1100
Cleveland, Ohio

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1 used by the Attorney General's Office?

2 A. I do not know.

3 - - - - -

4 (Thereupon, Prince Deposition
5 Exhibit 14, Multi-Page Document
6 Entitled "2010 Narcotics Unit
7 Compliance Enforcement Stats,"
8 Beginning Bates Number
9 CLEVE_001485361 - Marked Highly
10 Confidential, was marked for
11 purposes of identification.)

12 - - - - -

13 Q. Detective Prince, I'm handing you
14 what's been marked as Exhibit 14. It's a
15 two-page document bearing production number
16 CLEVE_001485361 and 262.

17 Have you seen this document before?

18 A. Yes, sir.

19 Q. What is it?

20 A. This is the 2010 narcotics unit
21 compliance enforcement stats.

22 Q. And you prepared this, I gather,
23 sometime in 2011 in the ordinary course of
24 business?

25 MR. CLUFF: Objection to form.

1 A. I prepared this in -- sometime in
2 2011.

3 Q. And you did so in the ordinary
4 course of business?

5 MR. CLUFF: Objection to form.

6 A. Yes.

7 Q. Directing your attention to the
8 fifth -- to the paragraph that begins, "I have
9 assisted district vice."

10 Do you see that?

11 A. Yes, sir.

12 Q. In the second sentence of that
13 paragraph you write, "I have seen an explosion
14 in pill related cases in the narcotics unit and
15 assist narcotics unit squads on a regular basis
16 accessing specific medical information and
17 records which are critical to pharmaceutical
18 related investigations."

19 Do you see that?

20 A. Yes, sir.

21 Q. And that is, in fact, accurate, is
22 it not, that there had been an explosion in
23 pill-related cases in Cleveland in 2010?

24 MR. CLUFF: Object to form.

25 A. The term "explosion" in 2010 may

1 have been accurate, understanding that I had
2 been doing this as a compliance detective for
3 two years; to me and what I saw, and what I had
4 been through in the increase in numbers, it was
5 an explosion, but this was nothing compared to
6 as we got into 2013, 2014, and, unfortunately,
7 as I look back, I could have used the term
8 "firecracker" and in 2014 that would have been a
9 nuclear explosion. So because of -- I was new.
10 To me this was an explosion, but what I didn't
11 foresee was the continued increasing of every
12 year through 2014, which made 2010 look like the
13 tip of the iceberg.

14 Q. Did the Cleveland Police Department
15 take any steps in response to your reported
16 explosion in pill-related cases?

17 MR. CLUFF: Object to form.

18 A. Yes.

19 And what I may need to add to --
20 this was the 2010 narcotics unit compliance
21 enforcement stats. This document, as well as
22 all the following documents, 2011, 2012 on -- I
23 mean, it's easy to see, this report served two
24 purposes. It was a report of the stats and what
25 the compliance unit had completed as well as the

1 highlights of some of the cases, but it also
2 served as information for the NADDI Purdue
3 grant, which was then turned over to the -- our
4 grants coordinator. This information and some
5 of the language that I use in this is also being
6 written to help me get a grant, that being the
7 NADDI Purdue grant. So it became, I believe, as
8 I'm trying to get grant money to assist me to
9 conduct investigations, I was not using language
10 that would not make this seem more easy to get a
11 grant, or if someone read it, would say, oh,
12 boy, you need a grant, you need help.

13 In addition to that, my
14 understanding and recollection is that when I
15 look at -- it says a 40 percent increase. A 40
16 percent increase may be only from 100 or so
17 complaints, and that the increase is based on a
18 much smaller number than we see in 2013 and
19 2014; and that since this is being written in
20 semi-real time, that it is based on the
21 information from that in comparison to the year
22 before.

23 Q. You sent this report and all
24 subsequent reports to your supervisor, correct?

25 MR. CLUFF: Object to form.

1 A. This report was turned over to my
2 commander.

3 Q. And all subsequent reports were
4 turned over to your commander at the time as
5 well, correct?

6 MR. CLUFF: Object to form.

7 A. If you mean by "all" -- are we
8 talking just about the compliance enforcement
9 stat reports?

10 Q. Yes. The one that you did every
11 year.

12 A. Yes. It was turned into him as well
13 as given to the grants coordinator, the person
14 who was then in charge of taking information out
15 of this report and putting it into a grant
16 proposal.

17 Q. Okay. And your supervisor at the
18 time of this report was Mr. Gingell?

19 A. No.

20 Q. Who was it at this time?

21 A. My direct supervisor as opposed to
22 overall -- we have a structure of -- the
23 commander is at the top.

24 Q. Let me ask, who did you send this to
25 besides the grants coordinator, Exhibit 14?

1 A. I believe Commander Gingell, and
2 whoever the sergeant -- whoever my sergeant was
3 at that time would also receive it.

4 Q. And you did not try and lead
5 Commander -- mislead Commander Gingell, did you?

6 MR. CLUFF: Object to form.

7 A. Mislead him how, sir?

8 Q. You would not have reported an
9 explosion in pill-related cases if in your mind
10 there was not an explosion in pill-related
11 cases, correct?

12 A. As I said, to me in 2010, or when I
13 was writing this, this was an explosion as
14 opposed or in comparison to the year before.

15 Q. Did you discuss your report with
16 Commander Gingell?

17 A. I don't recall, sir.

18 - - - - -

19 (Thereupon, Prince Deposition
20 Exhibit 15, Multi-Page Document
21 Entitled "2014 Narcotics Unit
22 Compliance Enforcement Stats,"
23 Beginning Bates Number
24 CLEVE_001485335 - Marked Highly
25 Confidential, was marked for